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HL Motor Group, Inc. and  
George Shanshashvili*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BYRONT AREVALO CIRIANO,

Plaintiff,

vs.

GEORGE SHANSHASHVILI; HL MOTOR  
GROUP, INC.,

Defendants.

CASE NO.:

**DEFENDANTS HL MOTOR GROUP,  
INC. AND GEORGE SHANSHASHVILI'S  
PETITION FOR REMOVAL OF ACTION**

Defendants, HL Motor Group, Inc. ("Highlight"), and George Shanshashvili ("Mr. Shanshashvili"), by their attorneys, LEWIS BRISBOIS BISGAARD & SMITH LLP, pursuant to 28 U.S.C. §§ 1332(a) and 1441(b), hereby remove this action from the District Court of Clark County, Nevada, to the United States District Court District of Nevada. As grounds for this removal, Defendants state as follows:

1. On September 29, 2021, Plaintiff filed a Complaint in the District Court of Clark County, Nevada entitled *Bryont Arevalo Ciriano vs. George Shanshashvili, an Individual, HL Group, Inc., a Foreign Corporation, and Does 1 to 20, inclusive, and Roe Corporations 1 through 10, inclusive*, Case No. A-21-841873-C (See, Exhibit 1).

1           2.     Plaintiff generally avers that he suffered severe personal injuries resulting from a  
2 December 13, 2019 motor vehicle collision in Clark County, Nevada with a vehicle owned by  
3 Highlight and operated by Mr. Shanshashvili. (*Id.*)

4           3.     Plaintiff further avers that he “incurred medical expenses, pain and suffering, and  
5 lost wages as a result of the accident, and he will continue to incur medical expenses, lost wages,  
6 and pain and suffering for the rest of his natural life.” (*Id.* at ¶14).

7           4.     In negotiations, Plaintiff has demanded settlement for amounts in excess of  
8 \$75,000.00.

9           5.     Plaintiff is a resident and citizen of Nevada. (*Id.* at ¶1).

10          6.     Highlight is a company that is organized and existing under the laws of Ontario,  
11 Canada. (*See*, Exhibit 2 at ¶3).

12          7.     For purposes of determining diversity of jurisdiction, Highlight is a citizen of  
13 Ontario, Canada because its principal place of business, offices and distribution center are located  
14 in Ontario, Canada (*Id.* at ¶4).

15          8.     The vehicle operated by George Shanshashvili at the time of the motor vehicle  
16 accident described in the Plaintiff’s Complaint, was owned by Highlight. (*Id.* at ¶6).

17          9.     On December 13, 2019, while engaged in the activity described in the Complaint in  
18 this matter, Mr. Shanshashvili was an employee of Highlight. (*Id.* at ¶7).

19          10.    Mr. Shanshashvili resides in and is a citizen of Ontario, Canada. (*Id.* at ¶8).

20          11.    Here, there is complete diversity between Plaintiff and Defendant and the amount  
21 in controversy exceeds \$75,000.00 as required by 28 U.S.C. § 144(b).

22          12.    By reason of the foregoing, this Court has original jurisdiction over this action  
23 pursuant to 28 U.S.C. § 1332(a). There is complete diversity of citizenship, and the amount in  
24 controversy exceeds \$75,000.00, exclusive of costs. Removal of the state court action to this Court  
25 is therefore appropriate under 28 U.S.C. § 1441(b).

26          13.    Removal of this action is timely under 28 U.S.C. § 1446(b) because this Notice of  
27 Removal was filed within thirty days after receipt by the Defendants, through service or otherwise,  
28

1 of a copy of the pleading, motion, order or other paper from which it may first be ascertained that  
2 the case is one which is or has become removable. Moreover, this Notice of Removal was filed  
3 within one year after commencement of this action.

4 14. Pursuant to 28 U.S.C. § 1446(d), contemporaneous with this filing, Defendants are  
5 serving a copy of this Notice of Removal upon Plaintiff and filing a copy with the Clerk of the  
6 District Court of Clark County, Nevada.

7 15. Defendants reserve the right to supplement this Notice of Removal and/or to  
8 present additional arguments in support of their entitlement to removal.

9 16. Removal is hereby effected without waiver of any challenges that Defendants may  
10 have to personal jurisdiction, venue or service of process. Further, no admission of fact, law or  
11 liability is intended by this Notice of Removal, and all defenses, affirmative defenses and motions  
12 are hereby reserved.

13 WHEREFORE, Defendants HL Motor Group, Inc. and George Shanshashvili hereby give  
14 notice of the removal of the above-referenced action now pending in the District Court of Clark  
15 County, Nevada, to the United States District Court District of Nevada.

16  
17 DATED this 6th day of June 2022.

18 LEWIS BRISBOIS BISGAARD SMITH LLP

19  
20 /s/ Steven Abbott

21 STEVEN B. ABBOTT, ESQ.

22 Nevada Bar No. 10303

6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

23 *Attorneys for Defendants HL Motor Group, Inc.*

24 *and George Shanshashvili*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of June, 2022, a true and correct copy of  
**DEFENDANTS HL MOTOR GROUP, INC. AND GEORGE SHANSHASHVILI'S**  
**PETITION FOR REMOVAL OF ACTION** was served with the Clerk of the Court through  
Case Management/Electronic Filing System.

Tamara Vannah, Esq.  
Robert D. Vannah, Esq.  
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*Attorneys for Plaintiff*

By /s/ Cindy Halas  
An Employee of  
LEWIS BRISBOIS BISGAARD & SMITH LLP